

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

CONCORD MANAGEMENT AND
CONSULTING LLC

Defendant.

CRIMINAL NUMBER:

1:18-cr-00032-2-DLF

**DEFENDANT CONCORD MANAGEMENT AND CONSULTING LLC’S RESPONSE
TO GOVERNMENT’S FILING REGARDING STATUS OF DISCOVERY AND
OBJECTION TO SEALING**

Defendant Concord Management and Consulting LLC (“Concord”), through counsel, respectfully submits this response to the Government’s Filing Regarding Status of Discovery (the “Discovery Filing”) and the accompanying Motion to File Under Seal.

While the government risks injury to its arms from patting itself on the back it fails to advise the Court that yesterday afternoon it transmitted to undersigned counsel discovery that included electronic data allegedly relevant to this case that was seized 18 months ago, in February 2018. In response to a question regarding this delay from undersigned counsel, the government declined to provide any explanation. So while the Court has pressured undersigned counsel to utilize the firewall process with respect to a potential motion to suppress, the government continues to produce U.S. Sensitive material that should have been provided to undersigned counsel over a year ago.

Further, Concord objects to the government's request to seal the Discovery Filing and the related Motion to Seal. The government's pleading contains no information that should be under seal.

Dated: August 30, 2019

Respectfully submitted,

CONCORD MANAGEMENT AND
CONSULTING LLC

By Counsel

/s/*Eric A. Dubelier*

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